



Catherine B. Templeton, Director

Promoting and protecting the health of the public and the environment

April 29, 2014

Commanding Officer NAVFAC Southeast ATTN: Mr. Dan Owens PO Box 30 Ajax Street North, Bldg 135 Jacksonville, Florida 32212

and

Commanding General NREAO ATTN: Mr. Tim Harrington PO Box 5028 Parris Island, SC 29905

RE: Comments to Draft RI SAP for Site 4, Site 13C, and UXO 2

Marine Corps Recruit Depot (MCRD)

Parris Island SC6 170 022 762

Dear Mr. Owens and Mr. Harrington:

The Division of Waste Management of the South Carolina Department of Health and Environmental Control (Department) completed the review of the above referenced document received March 28, 2014. Based on our review, the Department has comments. Please see the attached engineering, risk, and hydrogeology comments.

The Department's review is based on the information presented by MCRD to date; any information found to be contradictory may require further action. If you have any questions regarding this issue, please contact me at (803) 898-0368.

Sincerely,

Meredith Amick, P.E., Environmental Engineer DOD Corrective Action Section

Division of Waste Management

cc:

Lila Llamas, EPA Region 4 Annie Gerry, Hydrogeology Priscilla Wendt, SCDNR

Russell Berry, EQC Region 8, Beaufort Peggy Churchill, TtNUS

Engineering Memo Prepared by Meredith Amick Marine Corp Recruit Depot (MCRD) April 15, 2014

- 1. Please note at a minimum Land Use Controls will be necessary for the UXO 2 boundary area. The Land Use Control will be notation in the Base Master Plan that the area was once a small arms range. Additionally minimum LUCs (in the form of notation in the Base Master Plan that the area was once a dredge disposal area) will be necessary for the Site 13C Dredge Spoil Disposal Area.
- 2. Please discuss both the clear circular open area north and southeast of the "Potential Location of Fire Training Pit" on Figure 10-2.
- 3. Please provide further information on the "area of the identified buried anomaly" as discussed in the first paragraph of Section 11.3.
- 4. In Section 11.4 the Department believes that Decision Rule #2 should read, "For each chemical in each investigated medium, if the maximum measure chemical concentration exceeds human health screening values {and applicable background values} for a particular environmental medium and for that particular exposure scenario, the chemical will be classified as a chemical of potential concern (COPC) for that medium and risk type; otherwise, that chemical will be excluded from further consideration."
- 5. In Section 11.4 the Department believes that the last sentence of Decision Rule # 2 should read, "If risks to human receptors are acceptable (less than 1x10⁻⁶) then {no} further investigation or action is recommended to address human health risks."
- 6. In SAP Worksheet #20, there are 17 soil sampling locations listed for SVOCs and Metals. However, Figure 17-1 only shows 15 locations. Please correct and/or discuss the discrepancy.
- 7. Please ensure that the lab used is both DOD ELAP and SCDHEC certified.



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MEMORANDUM

TO:

Meredith Amick, P.E.

Department of Defense Corrective Action Section

Division of Waste Management

Bureau of Land and Waste Management

FROM:

Annie M. Gerry, Hydrogeologist

Department of Defense Corrective Action Section

Division of Waste Management

Bureau of Land and Waste Management

DATE:

April 23, 2014

RE:

Marine Corps Recruit Depot

SC6 170 022 762

Review of Draft- Sampling and Analysis Plan Remedial Investigation for Site 4 (Former Dredge Spoils Area Fire Training Pit), Site 13C (Dredge Spills Area) and UXO 2 (Rifle Range at Ballast Creek), Marine Corp Recruit Depot (MCRD), Parris Island, South Carolina, dated March 2014

The above referenced document has been reviewed with respect to the conditions of the Federal Facility Agreement (FFA) that the Department entered into with the Navy and EPA Region 4 in January 2005.

Based on review of this document, one comment was generated.

COMMENT

Page 60- Temporary Well Installation and Development- The text states that if there
is a conflict between the two methods (FBQSTP and SCDHEC regulations), the FBQSTP
(Field Branches Quality System and Technical Procedures), must be followed. If there is
a difference between the two guidance documents, the Navy will need to get State
concurrence.

Should you have any questions regarding this memo, please contact me via email at GerryAM@dhec.sc.gov or by phone at (803) 898-0359.

Carherme B. Templeton, Director Promoting and protecting the health of the public and the environment

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MEMORANDUM

TO:

Meredith Amick, P.E., Environmental Engineering Associate

Department of Defense Corrective Action Section

Division of Waste Management

Bureau of Land and Waste Management

FROM:

Kent Krieg, Risk Assessor

Department of Defense Corrective Action Section

Division of Waste Management

Bureau of Land and Waste Management

DATE:

April 28, 2014

RE:

Draft Sampling and Analysis Plan (FSP and QAPP) RI for

Site 4, Site 13c, and UXO 2

March 2014

The above referenced document by TetraTech has been reviewed. The Department has the following risk related comments.

1. Please ensure that the most recent screening values are used when preparing the data report. Also, it was noticed that some HHRA PAL references stated RBSSLs when they are MCL-based SSL values (i.e. 1,1,1-tricholoroethane and benzene). No response is necessary.

If you need any further information, feel free to contact me at (803) 898-0255.